

Agenda
State/EPA UIC Meeting
November 16, 2016

I. Discussion regarding the Tables in the State's letters

1. Questions/Comments/Differences when comparing Attachment A from the October 15, 2015 letter with Attachment 1 "Preliminary Assessment of 11 Aquifers HTAE" from the July 15, 2015 letter:
 - a. API 02918136 – Attachment A states the Walker Formation is exempt; where is the exempt status of this formation in the Round Mountain field documented?
 - b. API 02918114 and API 02918119 – these wells are injecting into the Olcese Formation which is an HTAE zone in the Round Mountain Field, but the wells are not marked as HTAE wells on Attachment A.
 - c. Kern River Field, Chanac – 12 or 13 wells into Chanac? Are all of the wells into both the Santa Margarita and the Chanac, or only 10?
 - d. Kern River Field – 32 or 36 wells into the Santa Margarita? 10 or 13 into both the Santa Margarita and the Chanac?
 - e. Round Mountain Field, Olcese – 4 wells permitted into both the Olcese and Walker **AND** Freeman-Jewett zones?
 - f. Round Mountain Field, Walker – 29 or 30 wells into the Walker?
2. Question/Comment on the Oct 15 176 wells letter:
 - Attachment A of the October 15 letter seems to indicate the state intends to treat all of the wells which inject into the HTAE formations as Category 3 wells subject to the February 2017 shut in deadline rather than the December 31, 2016 deadline since they also appear to inject into non HTAE HC zones. Is this correct?
3. Questions/Comments on the Oct 21 Water Board letter:
 - a. Why were NOVs not issued when the operator was late in responding or didn't respond at all? For example, see well #s 21, and 34-40.
 - b. What was the rationale for WB to issue NOVs for certain violations and not all violations? For example, some operators submitted work plans and/or technical reports late and did not receive a NOV (see wells #21, 22, 23, and 28 as examples) and other operators submitted work plans and/or technical reports late and received NOVs (see wells #2-4, 6-8, 10, etc.).
 - c. Well #2 on the list of 40 --an incomplete technical report was delivered to WB on 8/1/2014 and a revised one (final) was delivered to the WB on 9/9/2014; however, the reason for a NOV is an incomplete technical report? Does this mean the final technical report is also incomplete?

4. Question on the Oct 15, 2015 CAT 2 letter versus the July 31 letter Category 2 letter:

- Please explain how the count went from 24 wells of concern to 6.

5. Questions from a review of 176 table compared with information on the DOGGR website:

- In general, how regularly does DOGGR plan to update the website to reflect revised well data (e.g. status – active, idle, shut-in, etc., or type of well- disposal, EOR, etc.)? Assuming some of this data is coming from responses to information orders how is new information incorporated? Also, should all highlighted wells be revised to “shut in” rather than “for possible shut in”?
- How does DOGGR confirm that wells are actually plugged and abandoned? Are there written procedures for this?
- Some differences noted, please clarify:
 - API #02918119 – MacPherson Oil Company, Round Mountain, Attachment A to the October 15, 2015 letter indicates that this well was plugged on June 4, 2015, and the website show the status of this well as plugged and abandoned; but no paperwork to document this status was found on the website.
 - API #02984583 – E & B Natural Resources Management Corporation, Poso Creek – Attachment A to the October 15 letter states that this well has been shut-in since March 2015, except in the exempted Santa Margarita zone. On DOGGR’s website, injection data was reported for this well in August 2015. Into what zone is injection currently taking place?
 - API # 02947362 – MacPherson Oil Company, Round Mountain, there is a discrepancy as to the type of well – Disposal (WD) or water flood (WF); In Attachment A to the October 15 letter, the current status for this well is WD, and it is noted as injecting into a hydrocarbon bearing formation. The website indicates this well is a WF not a WD, and the last injection was in 2010. What is the correct status of this well?
 - API # 03044445 – CMO, Inc., Chico-Martinez - In Attachment A to the October 15 letter, the status for this well is “shut-in order has been issued by DOGGR”. DOGGR’s website indicates that this well is an O&G well, not an injection well. What is the correct status of this well?
 - API 02940729 – Chevron, Round Mountain – letter of relinquishment is not found on the website.
 - API 03010795 – Vintage, Kern River – letter of relinquishment is not

found on the website.

- II. Status of Arroyo Grande A/E application and response to public comments**
- III. Status of other AE proposals – Round Mountain – Main and Coffee Canyon; Tejon – Western**
- IV. Elk Hills update**
- V. Alon update**